

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>RONALD BROWN, M.D.</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1), (b)(1)(C),</b>
	<b>:</b>	<b>(possession with intent to distribute</b>
	<b>:</b>	<b>controlled substances – 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 860(a) (possession with intent</b>
	<b>:</b>	<b>to distribute controlled substances</b>
	<b>:</b>	<b>within school zone – 1 count)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From in or about January 2008 through in or about June 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD BROWN, M.D.**

knowingly and intentionally distributed tens of thousands of dosage units of controlled substances, that is, dosage units of mixtures and substances containing a detectable amount of oxycodone, a Schedule II controlled substance, by writing prescriptions for the controlled substances outside the course of professional practice for other than a legitimate medical purpose.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT TWO**

**THE GRAND JURY CHARGES THAT:**

From in or about January 2008 through in or about June 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD BROWN, M.D.**

knowingly and intentionally distributed tens of thousands of dosage units of controlled substances containing a detectable amount of oxycodone, a Schedule II controlled substance, by writing prescriptions for the controlled substances outside the course of professional practice for other than a legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), within 1,000 feet of the real property of the school commonly known as The DePaul Catholic School, located at 44 West Logan Street, Philadelphia, Pennsylvania 19144.

In violation of Title 21, United States Code, Section 860(a).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), set forth in this Indictment, defendant

**RONALD BROWN, M.D.**

shall forfeit to the United States of America:

- a. any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of, such offenses, including, but not limited to the real property known as 141 West Sylvania Street, Philadelphia, Pennsylvania; and
- b. any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

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FOREPERSON

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MICHAEL L. LEVY  
UNITED STATES ATTORNEY